



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NMA/RMN/AL

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 8, 2012

By ECF and Electronic Mail

Sarita Kedia, Esq.  
Elizabeth Macedonio, Esq.  
Gerald McMahon, Esq.

Re: United States v. Francis Guerra, et al.  
Criminal Docket No. 10-0147 (S-4) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides notice that it intends to call the experts whose anticipated testimony at trial is described below. The government reserves the right to call substitute expert witnesses as well as to call additional expert witnesses, and will provide advance notice of any intent to do so. The government also renews its request for reciprocal discovery from the defendants, including notice of any anticipated defense experts.

I. Medical Examiner Testimony

The government intends to call the following medical examiners to testify during trial.

A. Dr. Jonathan Arden

The government will seek to qualify Dr. Jonathan Arden, M.D., as an expert in forensic pathology. Dr. Arden's curriculum vitae is attached. Dr. Arden will testify about the autopsy he performed on Michael Devine on January 25, 1992. Dr. Arden is expected to testify about the Devine autopsy consistent with the report previously produced in discovery as discovery exhibit number 254.

